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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA

v.

BALDEMAR REYES

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**CRIMINAL COMPLAINT**

Mag. No. 22-13029

I, Matthew Herbert, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Task Force Officer with the United States Drug Enforcement Administration, and that this Complaint is based on the following facts:

**SEE ATTACHMENT B**

Continued on the attached page and made a part hereof.

*Matthew Herbert*

\_\_\_\_\_  
Matthew Herbert, Task Force Officer  
U.S. Drug Enforcement Administration

TFO Herbert attested to this Complaint  
by telephone pursuant to FRCP 4.1(b)(2)(A)  
on February 9, 2022 in the District of New Jersey

*Leda Dunn Wettre*

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HONORABLE LEDA DUNN WETTRE  
UNITED STATES MAGISTRATE JUDGE

**ATTACHMENT A**

**COUNT ONE**

**(Possession with Intent to Distribute Fentanyl)**

On or about February 8, 2022, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

BALDEMAR REYES,

did knowingly and intentionally possess with intent to 400 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**ATTACHMENT B**

I, Matthew Herbert, am a Task Force Officer with the United States Drug Enforcement Administration (“DEA”). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other items of evidence. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where statements of others are related herein, they are related in substance and part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. Law enforcement is investigating drug trafficking activity in the District of New Jersey and elsewhere. Pursuant to that investigation, law enforcement determined that defendant BALDEMAR REYES (“REYES”) was utilizing a hotel room in Secaucus, New Jersey (the “Room”) in furtherance of the distribution of controlled substances. Records maintained by the hotel demonstrated that REYES was the sole registered guest for the Room.

2. On or about February 8, 2022, in connection with the ongoing investigation, law enforcement apprehended REYES in the parking lot of the hotel. REYES was found in possession of a key to the Room, two iPhones, and one flip phone.

3. Thereafter, law enforcement executed a lawfully obtained search warrant within the Room. Inside a closet, law enforcement found a luggage bag that held approximately one kilogram of a white powdery substance, wrapped in brown tape. This substance field tested positive for the presence of fentanyl. Law enforcement also observed empty plastic wrappers that, based on my training, experience, and the investigation to date, were likely utilized to store additional one-kilogram quantities of narcotics.